



December 22, 2017

FCC Commissioners Pai, Carr, Clyburn, O'Rielly, and Rosenworcel,

New Lisbon Telephone Company, Inc. is a full-service communications provider in East Central Indiana. We utilize many different forms of technologies, including Fiber to the Home, DSL over copper and both Licensed and Unlicensed Fixed Wireless. Through these technologies we service approximately 3000 rural customers. Our unregulated CLEC, New Lisbon Broadband and Communications, LLC (NLBC) serves 2200 of these customers with our wireless technologies, with speeds from 2/1 Mbps for those in the most rural areas to 25/5 Mbps for those in areas where we have deployed LTE fixed wireless technology. We have invested extensively in the 3650-3700MHz CBRS band and hope to continue doing so in order to offer our rural customers the best possible service with the most bandwidth possible. Our CBRS equipment incorporates LTE technology and we are excited about the future of this technology for our company and other small wireless ISPs in the rural areas of America.

We have been anticipating the ability of purchasing the Census Blocks rights for additional CBRS spectrum for much of our network, especially those areas with little to no service today. However, under extreme pressure by the cellular wireless industry, the FCC has issued a Notice of Proposed Rule Making seeking to make the CBRS band just another part of their vast licensed spectrum holdings by enlarging these auction blocks from Census Block size to PEA size; areas hundreds or thousands of times larger. If the wishes of the Cellular companies are granted and additional CBRS spectrum is auctioned off in PEA size areas, small wireless ISPs will not be able to compete, and this spectrum will be lost. As the attached map clearly shows, NLBC today serves parts of 4 counties in Eastern Indiana. The PEA that we are included in covers parts of 13 counties, an area roughly five times our current footprint and which covers some of the most densely populated areas east of Indianapolis, as well as the metro areas of Columbus and Richmond. It will be impossible for NLBC to make a competitive bid on that large of a territory. However, the large Cellular carriers will very likely successfully bid on the large PEA just to obtain spectrum in those metropolitan areas, with no intention of ever providing service to

6369 East Dublin Pike • P.O. Box 38 • New Lisbon, IN 47366

[www.NLTC.net](http://www.NLTC.net)

Telephone: (765) 332-2413

Fax: (765) 332-3111

those areas more rural in nature. Their current lack of coverage in these same rural areas today is evidence of that intent.

Another desire of the larger Cellular carriers is to have the originally proposed 3-year licenses increase to a 10-year license, with an automatic renewal. This change will also reduce our ability to bid, as the longer the term the more expensive the licenses will be.

Changing the CBRS rules at this late date will only serve to stifle future wireless expansion in rural America, as the large Cellular carriers will make little or no effort to offer a ubiquitous and affordable service to those residents that need it desperately. NLBC has budgeted an expansion of 15 towers in 2018 and every location is proposed to have CBRS LTE equipment installed on it. This will give NLBC the ability to cover more homes and offer faster Internet speeds in the very rural rolling hills of eastern Indiana.

It is imperative that the CBRS band stay the way that it was originally designed and intended, where WISPs across the nation can deploy fixed wireless Internet service where fiber or copper technologies are not practical and large Cellular companies won't make the investment.

Respectfully,

A handwritten signature in dark ink, appearing to read "J.E. Greene, Jr.", with a large, stylized loop at the end.

John Greene – CEO

New Lisbon Telephone Company, Inc.